

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN**

AVKO EDUCATIONAL RESEARCH  
FOUNDATION, a Michigan  
Corporation, and DONALD J.  
MCCABE, author,

Case No.: 1:11-cv-13381-TLL-CEB

Plaintiffs,

Hon: Thomas L. Ludington

v.

THOMAS A. MORROW, an individual,  
WAVE 3 LEARNING, INC.; HOME  
SCHOOL HOLDINGS, INC., and HOME  
SCHOOL, INC;

Defendants.

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SUSAN PAYNE WOODROW (P29844)  
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*Foundation, a Michigan Corporation,*  
*and Donald J. McCabe, author*  
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**PLAINTIFFS' ENTRY OF DEFAULT AGAINST  
HOME SCHOOL HOLDINGS, INC**

Plaintiffs' request the Clerk to enter their default against Defendant Home School Holdings, Inc. (HSH) pursuant to Fed Rul Civ Proc Rule 55(a) and says:

1. Complaint against Defendant HSH was served.
2. HSH has failed to appear, plead, or otherwise defend.
3. HSH has informed counsel for Plaintiff that they are choosing not to defend.

4. Multiple conferences and motions have been held and Defendant HSH failed to appear.

5. The clerk has no alternative but to enter this default.

Judgment on the default may be requested later.

Dated: March 25, 2013

/s/ Susan Payne Woodrow  
Susan Payne Woodrow P29844  
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### **AFFIDAVIT**

After being first sworn, Susan Payne Woodrow states that she caused Home School Holdings, Inc. (HSH) to be served the complaint in this matter. She was contacted by a Dave Nicholson, an officer and principal of HSH who indicated that HSH had no intention of defending. Consistent with that representation, HSH has done nothing. Entry of Default under Rule 55(a) is proper.

/s/ Susan Payne Woodrow  
Susan Payne Woodrow

### **PROOF OF SERVICE**

Susan Payne Woodrow certifies that she served a copy of the above pleading and exhibits to all parties of record by ECF on March 25, 2013.

/s/ Susan Payne Woodrow  
Susan Payne Woodrow